

## REMARKS

Claims 1-18 and 20 are pending. The Examiner's reconsideration of the objections and rejections is respectfully requested in view of the amendments and remarks.

The Specification has been objected to for various informalities: an incomplete sentence at page 1, a reference to a block not depicted in the Figures, and a grammatical error at page 17, lines 12-13 (amending -if it- to "with"). Each of the informalities has been addressed in the amendments to the Specification above. Reconsideration of the objection is respectfully requested.

The Drawings have been objected to for an informality – the Specification referred to a block not shown in Figure 1. The Specification has been amended to delete the reference and clarify the description. Reconsideration of the objection is respectfully requested.

Claims 6 and 7 have been objected to, wherein the Examiner suggested correcting the word –motonically- to “monotonically.” Claims 6 and 7 have been amended to correct the error. The Examiner's reconsideration of the objection is respectfully requested.

Claim 19 has been rejected under 35 USC 101, because the claimed invention is directed to non-statutory subject matter.

Claim 19 has been cancelled. Reconsideration of the rejection is respectfully requested.

Claims 2-10 have been rejected under 35 USC 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

The term “goodness” has been deleted from Claims 2-10 to clarify the claimed subject matter. The Examiner’s reconsideration of the rejection is respectfully requested.

Claim 7 has been rejected under 35 USC 112, first paragraph, wherein the Examiner suggested essentially that the specification does not reasonably provide enablement for selecting an alignment and generalization from the all possible alignments and generalizations that maximizes a linearly increasing function of a goodness of alignment functional and a goodness of generalization functional.

Claim 10 has been rejected under 35 USC 112, first paragraph, wherein the Examiner suggested essentially that the specification does not reasonably provide enablement for selecting an alignment by maximizing a goodness of alignment-generalization functional using a gradient-descent technique.

Referring to Claims 7 and 10: the linearly increasing function and the gradient-descent function are well known in the art. One of ordinary skill in the art would know how to apply either the linearly increasing function or the gradient-descent function to perform a selection, and more particularly how to perform a selection of an alignment in view of the Specification. Reconsideration of the rejection is respectfully requested.

Claims 1-19 have been rejected under 35 U.S.C. 102(b) as being anticipated by Bellegarda (USPN 5,644,652). The Examiner stated essentially that Bellegarda teaches or suggests all the limitations of Claims 1-19.

Claims 1 and 18 claim, *inter alia*, “recording at least one trace of at least one instance of a procedure; simultaneously performing an alignment and generalization of the at least one trace; and generating the one or more computer-executable procedures consistent with the alignment and generalization.”

Bellegarda teaches a system for automatic handwriting recognition (see Abstract). Bellegarda does not teach “generating the one or more computer-executable procedures consistent with the alignment and generalization” as claimed in Claims 1 and 18. Bellegarda relates to an entirely different art – handwriting recognition. Further, at most Bellegarda teaches the derivation of a statistical model of different handwriting samples (see col. 4, lines 10-31). The derivation of a model is not analogous to generating a computer-executable procedure. For example, a model is not useful without a procedure. The procedures of Bellegarda are not changed by the different models, rather the models are merely plugged into the procedure for determining a handwriting match. Bellegarda does not teach methods for generating procedures. Thus, Bellegarda fails to teach, “generating the one or more computer-executable procedures consistent with the alignment and generalization” as claimed in Claims 1 and 18. Therefore, Bellegarda fails to teach all the limitations of Claims 1 and 18.


Claims 2-17 depend from Claim 1. The dependent claims are believed to be allowable for at least the reasons given for Claim 1. Reconsideration of the rejection is respectfully requested.

Claim 20 claims, *inter alia*, “generating the one or more computer-executable procedures executable by the computer system consistent with a selected generalized and aligned user action.” The cited art of record is not believed to teach or suggest “generating the one or more computer-executable procedures executable by the computer system consistent with a selected generalized and aligned user action.” Therefore, Claim 20 is believed to be in condition for allowance.

With reference to the Examiner’s note beginning on page 5 of the Detailed Action, several terms have been listed with respective definitions. Respectfully, these terms have at least the scope of the definitions given in the Detailed Action. In addition, the terms may have additional scope as given in the Specification, for example, the terms “procedure” and “trace” have additional disclosure that may modify the particular definitions listed by the Examiner.

For the forgoing reasons, the present application, including Claims 1-18 and 20, is believed to be in condition for allowance. The Examiner’s early and favorable action is respectfully urged.

Respectfully submitted,



---

Nathaniel T. Wallace  
Reg. No. 48,909  
Attorney for Applicants

**F. CHAU & ASSOCIATES, LLC**  
130 Woodbury Road  
Woodbury, New York 11797  
TEL: (516) 692-8888  
FAX: (516) 692-8889